

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Docket No. 3:16-CR-
	:	
vs.	:	
	:	(Judge)
TEELA KELCHNER	:	
Defendant	:	

INFORMATION

COUNT 1

THE UNITED STATES CHARGES

1. From at least in or about July of 2014, and continuing thereafter until in or about October of 2015, in the Middle District of Pennsylvania, and elsewhere, the defendant,

TEELA KELCHNER,

did knowingly and willfully combine, conspire, confederate, and agree with persons known and unknown to the United States, to commit an offense against the United States, specifically to aid and abet the attempted entry to the United States of an alien, by making a willfully false and misleading representation in violation of Title 8, United States Code, Section 1325(a).

Object of the Conspiracy

2. It was the object of the conspiracy for members of the conspiracy to arrange sham marriages between an alien and a United States citizen, and then to assist the alien in completing and submitting the forms to petition the United States government for an immigration status, based on the sham marriage, that would allow the alien to enter and remain in the United States.

Manner and Means of the Conspiracy

3. In furtherance of the conspiracy and to effect its objects, the defendant and her coconspirators employed the following manner and means:

4. During the period mentioned in the paragraph 1 above, the defendant and a coconspirator met in Harrisburg, Pennsylvania with an alien and offered to arrange a sham marriage between the United States citizen defendant and the alien. At the time the defendant knew that marriage to a United States citizen served as grounds for an alien to qualify for permanent resident status in the United States.

5. The defendant and her coconspirator made arrangements for the alien and the defendant to obtain a marriage license, to go through

a civil marriage ceremony, and to obtain official documents that verified the marriage. In the sham marriage, the alien and the defendant had no intention of cohabiting or engaging in any other joint conduct, except that which would be necessary to complete the immigration process.

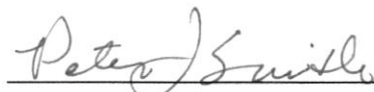
Overt Acts

6. In furtherance of the conspiracy and to effect the object of the conspiracy, the following overt acts, among others, were committed in the Middle District of Pennsylvania

7. On July 1, 2014, TEELA KELCHNER and a coconspirator traveled to Harrisburg, Pennsylvania and received \$5000 in consideration for TEELA KELCHER's agreement to enter into a sham marriage.

8. On November 20, 2014, TEELA KELCHNER traveled to Wilkes-Barre, Pennsylvania in order to obtain a marriage license and to go through with a civil marriage ceremony, knowing that the marriage was a sham.

All in violation of Title 18, United States Code, Section 371.


PETER J. SMITH *By Tkl*
UNITED STATES ATTORNEY

Dated: January 19, 2016